

Appendix C:
Comparison of Plaintiffs' RICO Allegations
Asserted in the Fourth Amended Complaint and
RICO Allegations Asserted in *Laydon* Action

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<i>Laydon</i> Proposed Third Amended Complaint¹	<i>Sullivan</i> Fourth Amended Complaint²
Defendants completed all elements of wire fraud within the United States or while crossing United States borders. Defendants did so by:	Defendants completed all elements of wire fraud within the United States or while crossing United States borders. Defendants did so by:
(i) transmitting or causing to be transmitted false and artificial Yen-LIBOR and/or Euroyen TIBOR quotes in the U.S. or while crossing U.S. borders through electronic servers located in the United States;	(i) transmitting or causing to be transmitted false and artificial Euribor quotes in the U.S. or while crossing U.S. borders through electronic servers located in the United States;
(ii) transmitting or causing to be transmitted false and artificial Yen-LIBOR and/or Euroyen TIBOR quotes that were relied on by Thomson Reuters and the BBA and/or JBA in collecting, calculating, publishing and/or disseminating the daily Yen-LIBOR and/or Euroyen TIBOR submissions of each Defendant and the daily Yen-LIBOR and/or Euroyen TIBOR fix that was transmitted, published and disseminated in the United States or while crossing U.S. borders through electronic servers located in the United States;	(ii) transmitting or causing to be transmitted false and artificial Euribor quotes that were relied on by Thomson Reuters and the EBF in collecting, calculating, publishing and/or disseminating the daily Euribor submissions of each Defendant and the daily Euribor fix that was transmitted, published and disseminated in the United States or while crossing U.S. borders through electronic servers located in the United States;
(iii) coordinating their daily Yen-LIBOR and/or Euroyen TIBOR submissions and their Euroyen-based derivatives trading positions in electronic chats routed through electronic servers located in the United States;	(iii) coordinating their daily Euribor submissions and their Euribor-based derivatives trading positions in electronic chats routed through electronic servers located in the United States;
(iv) sending trade confirmations based on manipulated Yen-LIBOR and/or Euroyen TIBOR rates to counterparties in the United States.	(iv) sending trade confirmations based on manipulated Euribor rates to counterparties in the United States.

¹ *Laydon* Proposed Third Amended Complaint ¶¶ 764, No. 12-cv-03419, Dkt. No. 302-2 and 302-3.

² FAC ¶ 482.